

FILED IN OPEN COURT  
DATE: 4/26/18  
A. Whaley  
DEPUTY CLERK

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA :  
:  
:  
v. : Criminal No. 3:176CR00014  
:  
RICHARD ALAN WELLBELOVED-STONE :

STATEMENT OF FACTS

At all times relevant to the Indictment, the defendant, RICHARD ALAN WELLBELOVED-STONE, lived in Charlottesville, Virginia. In June and July 2017, the defendant communicated online, via KIK instant messenger and via email, with an undercover law enforcement officer (U/C) located in England. The U/C was posing as a father who had been engaging in sexual contact with his purported daughters. During his communications with the U/C, the defendant asked multiple questions about the U/C's alleged relationships with the fictional daughters and claimed that he (the defendant) was sexually interested in a particular young girl, indicated that he was "slowly cultivating [her] curiosity," and indicated that he had already "had a little taste" of her. He told the U/C that he expected to spend some significant time with the same girl that month. The defendant further solicited images from the U/C after the U/C claimed that he had been molesting his alleged daughters and asked if the U/C had "any links to pics?" He also told the U/C during another online conversation that he was fantasizing about the above-referenced girl. He further asked how the U/C got his daughters to understand the need for

secrecy and later told the U/C that he had watched live video of young teens, an 11 year old boy, and a brother with an approximately nine-year old sister.

Further investigation in July 2017, including information gleaned from the returns on summonses issued by Homeland Security Investigations, ultimately linked the IP address used by the defendant during communications with the U/C to the defendant. Open source information indicated that the defendant was a school teacher in Charlottesville.

On July 25, 2017, investigators with Charlottesville Police Department, Homeland Security Investigations and other agencies executed a state search warrant at the defendant's Charlottesville home. During the search, multiple devices were seized. Previews of two cellphones (a Samsung Nexus S and iPhone 7 Plus) revealed several images depicting the lascivious exhibition of the genital or pubic areas of the two minors referenced in Counts One through Three of the Indictment. A federal search warrant was obtained to search the seized digital devices further.

The image(s) of Minor 1 charged in Count One were produced in September 2013. The images of Minor 2 charged in Counts Two and Three were produced on two days in May 2017, and depict the minor the defendant is believed to have been discussing with the U/C. Each of the images depict the lascivious exhibition of the genital or pubic area of the two minors. Some of the images depicting Minor 2 show the defendant touching the girl's external labia. It appears that each of the minors was likely sleeping during the production of the images, and neither child's face is visible in any of the child pornography images. Information from each of the minors' parents confirmed their identities. The parents corroborated certain details about the defendant's knowledge of and access to the children, including that the defendant had contact with the minors

while they were not present. Minor 2's parents specifically confirmed that the defendant had access to Minor 2 on the dates in May 2017 when the pornographic images were produced.

Additionally, a parent of Minor 1 identified the pajamas worn by the child depicted in the images as belonging to Minor 1. A folder on the defendant's Apple laptop computer "Macintosh HD\Users\rickw\My Pictures\2013\" contained an image of Minor 1 wearing the same pajamas that she was wearing when the defendant produced the pornographic images of her. The folder name also contained Minor 1's first name and information describing the context of the defendant's contact with her at the time. Three other similar non-pornographic images were found on one of the defendant's Lacie hard drives in a folder "LA-PUBLIC\Pictures\My Pictures\pics from Liz's Phone\". Other pictures with the same date depict Minor 1 naked in a bathtub with the defendant just outside the bathtub. Additional investigation revealed that Minor 1 had spent significant time with the defendant previously.

The defendant also collected other non-self-produced child pornography, including depictions of prepubescent minors and including file names with descriptive titles consistent with child pornography. For example, one of the images had the file name "...!!Pthc Lsm Magazine 9Yo Kidzilla Pre-Teen young Little Girls Harry Potter Jenny – Lsm-004-0691 (5)U.jpg." A movie file depicting a minor girl performing oral sex was entitled "...pthc 12 yo holy cross middle school cougar girl sucks young boyfriend – homemade webcam.mpg." Forensic examination of an Apple laptop indicated that the defendant had installed the eMule peer-to-peer program. Search terms included "pre-teen," "young girl," and "lolita."

Minors 1 and 2 were each young, prepubescent, girls when the defendant produced the child pornography at issue in Counts One through Three. The digital items used to produce and

possess the child pornography in Counts One through Four were manufactured outside Virginia.

The two phones used to produce the images were owned and used exclusively by the defendant.

2/5/18  
Date



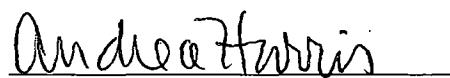
RICHARD ALAN WELLBELOVED-STONE  
Defendant

4-25-18  
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Lisa M. Lorish  
Assistant Federal Public Defender  
Attorney for Defendant

4-25-18  
Date

  
Andrea Harris  
Assistant Federal Public Defender  
Attorney for Defendant

4/26/18  
Date

  
Nancy S. Healey  
Assistant United States Attorney  
Virginia State Bar No. 39447

4/26/18  
Date

  
Leslie Williams Fisher  
Trial Attorney  
Child Exploitation & Obscenity Section  
U.S. Department of Justice